

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

AMANDA BOSARGE, JAQUELYN BUTLER,  
KIMBERLY HARRELL, WILLIAM MORGAN,  
PASTOR PAUL PERKINS, BRANDI RENFROE,  
and DR. JEANA STANLEY, Individually and on  
behalf of their Minor Children

PLAINTIFFS

VS.

CIVIL ACTION NO. 1:22-cv-233-HSO-BWR

DANIEL P. EDNEY, in his official capacity  
as the State Health Officer; LYNN FITCH,  
in her official capacity as Attorney General  
of Mississippi; ASHLEY BLACKMAN, in  
her official capacity as Principal of East Central  
Lower Elementary School; DR. ARCHIE R.  
MITCHELL, in his official capacity as  
Principal of Senatobia Elementary School;  
ALLISON MERIT, in her official capacity  
as Principal of North Bay Elementary School;  
DR. ASHLEY ALLRED, in her official  
capacity as Principal of Vancleave Upper  
Elementary School; and DOUGLAS L.  
TYNES, in his official capacity as the City  
Prosecutor for Ocean Springs, Mississippi

DEFENDANTS

**UNOPPOSED MOTION FOR ADDITIONAL TIME  
WITHIN WHICH TO RESPOND TO VERIFIED COMPLAINT  
FOR DECLARATORY AND INJUNCTIVE RELIEF**

COME NOW defendants, Ashley Blackman, in her capacity as Principal of East Central Lower Elementary School, and Dr. Ashley Allred, in her capacity as Principal of Vancleave Upper Elementary School (hereinafter “defendants”), and without waiving, but hereby expressly reserving, all rights to assert any and all defenses, including, but without being limited to, any and all defenses available under Fed.R.Civ.P. 12, file their unopposed motion for additional time to respond to plaintiffs’ complaint [Doc. 1]. In support of this motion, the undersigned attorney assigns the following grounds or reasons, to-wit:

1. On September 23, 2022, the Court entered its order granting defendants' motion for additional time to respond to plaintiffs' complaint [Doc. 18], making the deadline for defendants to respond to the complaint October 19, 2022.

2. Since then, counsel for plaintiffs have offered the courtesy of allowing defendants Blackman and Allred until November 14, 2022, to respond to the complaint, since that is the date on which response will be due from the Attorney General of the State of Mississippi, and defendants Blackman and Allred want to accept that offer and file their response to the complaint on November 14, 2022.

WHEREFORE, PREMISES CONSIDERED, defendants, Ashley Blackman, in her capacity as Principal of East Central Lower Elementary School, and Dr. Ashley Allred, in her capacity as Principal of Vancleave Upper Elementary School, respectfully requests the Court enter an order allowing defendants up to and including November 14, 2022, to respond to plaintiffs' complaint.

THIS 18<sup>th</sup> day of October 2022.

Respectfully submitted,

ASHLEY BLACKMAN and  
DR. ASHLEY ALLRED, Defendants

By: /s/ Joseph A. O'Connell  
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*Attorneys for Defendants, Ashley Blackman and Dr. Ashley Allred*

**CERTIFICATE OF SERVICE**

I, Joseph A. O'Connell, do hereby certify that I have this day electronically filed the above and foregoing with the Clerk of Court using the ECF system, which sent notification of such filing to the following:

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*Attorneys for Defendant, Douglas L. Tynes*

THIS 18<sup>th</sup> day of October 2022.

/s/Joseph A. O'Connell